

Arran Isle Limited and its Subsidiary Companies (“Arran Isle”) Equality and Diversity Policy Statement

Purpose and Objective

This document describes the structured processes within the Arran Isle Group (the Group) to ensure equality of opportunity and respect for diversity and preventing unlawful discrimination in our relationship with our employees, customers and others.

Everyone in the Group must comply with the policy, for example by treating each other fairly and with respect, and by embedding such values in the workplace and challenging inappropriate behaviour and processes.

Regulation and Legislation

In developing and implementing its equality and diversity policy, the Group will comply with the principles contained in the UK Equality Act 2010 (the Act) and with any future anti-discrimination legislation and associated codes of practice.

The Act defines the various kinds of discrimination with reference to the characteristics which are protected under the Act. In summary, the law requires that employees have a right to be treated fairly. It also prohibits discrimination based on one of a number of Protected Characteristics, as listed below.

Protected Characteristics for Employees

- Disability;
- Gender reassignment;
- Marriage or civil partnership;
- Pregnancy or maternity;
- Race;
- Religion or belief;
- Sexual orientation;
- Sex (gender);
- Age.

Policy Statement

The Group is committed to eliminating discrimination and promoting equality and diversity. This applies to all aspects of the Group’s dealings with employees, customers, suppliers and other external third parties.

Employment

The Group is an equal opportunity employer and will treat everyone equally. All aspects of employment are covered by this commitment, including:

- recruitment and selection;
- remuneration and other benefits;
- promotion;
- opportunities for training and development;
- other terms of employment;
- disciplinary matters;
- selection for redundancy and dismissal.

Arran Isle Limited and its Subsidiary Companies (“Arran Isle”) Equality and Diversity Policy Statement

Work Environment

The Group will treat everyone fairly and equally and with the same attention, courtesy and respect and will not discriminate without lawful cause against any person, nor victimise or harass them on the grounds of any Protected Characteristic.

The Group will take such steps and make such adjustments as are necessary in all the circumstances in order to prevent any employee from being placed at a substantial disadvantage in comparison with those who are not disabled.

The Group will also take all reasonable steps to provide a work environment in which all employees are treated with respect and dignity and that is free from harassment and bullying including any based on Protected Characteristics.

Employee and Third-Party Responsibility

All employees are responsible for conducting themselves in accordance with this policy. The Group will not condone or tolerate any form of harassment, whether engaged in by employees or by outside third parties who do business with the Group, such as customers and suppliers.

All employees have a duty to co-operate to make sure that this policy is effective in ensuring equal opportunities and in preventing discrimination, harassment or bullying. Action will be taken under the Group’s disciplinary procedure against any employee who is found to have committed an act of improper or unlawful discrimination, harassment, bullying or intimidation.

Employees should also be aware that they can be held personally liable for any act of unlawful discrimination or harassment. Employees who commit serious acts of harassment may also be guilty of a criminal offence.

The Group will also take appropriate action against any third parties who are found to have committed an act of improper or unlawful harassment against its employees.

Direct Discrimination

Direct discrimination occurs when, because of one of the Protected Characteristics, a person is treated less favourably than others are treated or would be treated.

This includes:

- In the case of pregnancy and maternity direct discrimination occurs if they are treated in a way because of their Protected Characteristic, without needing to compare treatment to someone else.
- Treating a disabled person unfavourably because of something connected with their disability when this cannot be justified (known as discrimination arising from a disability).
- Failing to make reasonable adjustments for a disabled person.

The Group will take all reasonable steps to eliminate direct discrimination in all aspects of its dealings.

Arran Isle Limited and its Subsidiary Companies (“Arran Isle”)

Equality and Diversity Policy Statement

Indirect Discrimination

Indirect discrimination is treatment that may be equal in the sense that it applies to all individuals, but which is discriminatory in its effect on, for example, one particular sex or racial group.

Indirect discrimination occurs when there is applied to the person a provision, criterion or practice (PCP) which is discriminatory in relation to a Protected Characteristic of the person. A PCP is discriminatory in relation to a Protected Characteristic of the person if:

- It is applied, or would be applied, to persons with whom the individual does not share the Protected Characteristic.
- The PCP puts, or would put, persons with whom the individual shares the Protected Characteristic at a particular disadvantage when compared with persons with whom the individual does not share it.
- It puts, or would put, the individual at that disadvantage.
- It cannot be shown by the Group to be a proportionate means of achieving a legitimate aim.

The Group will take all reasonable steps to eliminate indirect discrimination in all aspects of its professional dealings.

Recruitment, Advertising and Selection

The recruitment process will be conducted in such a way as to result in the selection of the most suitable person for the job in terms of relevant experience, abilities and qualifications. The Group will apply its equal opportunities policy statement at all stages of recruitment and selection, in all its businesses.

Advertisements will aim to positively encourage applications from all suitably qualified and experienced people. When advertising job vacancies, in order to attract applications from all sections of the community, the Group will, as far as reasonably practicable:

- Ensure advertisements are not confined to those areas or publications which would exclude or disproportionately reduce the numbers of applicants with a particular Protected Characteristic.
- Avoid setting any unnecessary provisions or criteria which would exclude a higher proportion of applicants with a particular Protected Characteristic.

Where vacancies may be filled by promotion or transfer, they will be published to all eligible employees in such a way that they do not restrict applications from employees with a particular Protected Characteristic.

However, where, having regard to the nature and context of the work, having a particular Protected Characteristic is an occupational requirement and that occupational requirement is a proportionate means of achieving a legitimate aim, the Group will apply that requirement to the job role and this may therefore be specified in the advertisement.

The selection of new staff will be based on the job requirements and the individual's suitability and ability to do, or to train for, the job in question.

If it is necessary to assess whether personal circumstances will affect the performance of the job (for example, if the job involves unsociable hours or extensive travel), this will be discussed objectively, without detailed questions based on assumptions about any of the Protected Characteristics.

Arran Isle Limited and its Subsidiary Companies (“Arran Isle”) Equality and Diversity Policy Statement

Training and Promotion

All processes to select and appoint employees for promotion, training and development will not be discriminatory, and shall be conducted at all times in accordance with the requirements of this policy to ensure equality and diversity of opportunities. These will be checked from time to time to assess their effectiveness and compliance with the policy.

When a group of workers who predominantly have a particular Protected Characteristic appear to be excluded from access to promotion, transfer and training and to other benefits, the promotional system will be reviewed to ensure there is no unlawful discrimination.

Terms of Employment, Benefits, Facilities and Services

All terms of employment, benefits, facilities and services will be reviewed from time to time, in order to ensure that there is no unlawful direct or indirect discrimination because of one or more of the Protected Characteristics.

The Group will have regard to its duty to make reasonable adjustments to work provisions and practices or to physical features of work premises or to provide auxiliary aids or services in order to ensure that disabled clients, employees or partners are not placed at a substantial disadvantage in comparison with persons who are not disabled. No costs of any such adjustments will be passed on.

Bullying and Harassment

This policy covers bullying and harassment in the workplace and in any work-related setting outside the workplace, for example, during business trips and at work-related social events.

Bullying is offensive or intimidating behaviour or an abuse or misuse of power which undermines or humiliates a person.

An employee harasses another employee if they:

- a) engage in unwanted conduct related to a Protected Characteristic, and the conduct has the purpose or effect of violating the other employee's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that other person.
- b) engage in unwanted conduct of a sexual nature, and the conduct has the purpose or effect of violating the other employee's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that other employee.
- c) or a third party engage in unwanted conduct of a sexual nature or that is related to gender reassignment or sex, that has the purpose or effect of violating the other employee's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that other employee. This also includes situations where, because of that other employee's rejection of or submission to the conduct, they treat, or imply that they will treat that other employee less favourably than they would treat them if they had not rejected, or submitted to, the conduct.

Unwanted conduct will still amount to harassment if it is based on the Protected Characteristic of a third party with whom the employee is associated and not on the employee's own Protected Characteristic, or if it was directed at someone other than the employee, or even at nobody in

Arran Isle Limited and its Subsidiary Companies (“Arran Isle”) Equality and Diversity Policy Statement

particular, but they witnessed it. In addition, harassment can include cases where the unwanted conduct occurs because it is perceived that an employee has a particular Protected Characteristic, when in fact they do not.

Conduct may be harassment whether or not the person intended to offend. Something intended as a “joke” or as “office banter” may offend another person. Every employee has the right to decide for themselves what behaviour they find acceptable to them.

Behaviour, which a reasonable person would realise would be likely to offend an employee will always constitute harassment, without the need for the employee having to make it clear that such behaviour is unacceptable, for example, touching someone in a sexual way.

With other forms of behaviour, it may not always be clear in advance that it will offend a particular employee, for example, office banter and jokes. In these cases, the behaviour will constitute harassment if the conduct continues after the employee has made it clear, by words or conduct, that such behaviour is unacceptable to him or her. A single incident can amount to harassment if it is sufficiently serious.

Examples

Bullying and harassment may be verbal, non-verbal, written or physical. Examples of unacceptable behaviour include, but are not limited to, the following:

- Sexual advances, requests for sexual favours, or any other conduct of a sexual nature.
- Subjection to obscene or other sexually suggestive or racist comments or gestures, or other derogatory comments or gestures related to an anti-harassment Protected Characteristic.
- The offer of rewards for going along with sexual advances or threats for rejecting sexual advances.
- Jokes or pictures of a sexual, sexist or racial nature or which are otherwise derogatory in relation to a Protected Characteristic.
- Demeaning comments about an employee’s appearance.
- Questions about an employee’s sex life.
- The use of nicknames related to a Protected Characteristic whether made verbally, in writing, by email, or using social media of any type.
- Picking on or ridiculing an employee because of a Protected Characteristic.
- Isolating an employee or excluding him or her from social activities or relevant work-related matters because of a Protected Characteristic.

Reporting Complaints

All allegations of discrimination or harassment will be dealt with seriously, confidentially and speedily. The Group will not ignore or treat lightly grievances or complaints of discrimination or harassment from employees.

If an employee wishes to make a complaint of discrimination, you should use the local grievance procedure or report the matter under the Group’s Whistleblowing Policy.

Any employee who is found to have discriminated against or harassed another employee in violation of this policy will be subject to disciplinary action under the local business’ disciplinary procedure. Such behaviour may be treated as gross misconduct and could render the employee liable to summary dismissal. In addition, line managers who had knowledge that such discrimination or

Arran Isle Limited and its Subsidiary Companies (“Arran Isle”) Equality and Diversity Policy Statement

harassment had occurred in their departments but who had taken no action to eliminate it will also be subject to disciplinary action under the disciplinary procedure.

Promoting Equality of Opportunity and Respect for Diversity

The Group’s employees will be informed of this policy and will be provided with equality and diversity information and/or training appropriate to their needs and responsibilities. All those who act on the Group’s behalf will be informed of this policy and will be expected to pay due regard to it when conducting business on the Group’s behalf and to promote the principles of equality and diversity.

The Group will make every effort to reflect its commitment to equality and diversity in its marketing and communication activities, and those of all its subsidiaries.

Implementation & Review

This policy will be reviewed annually by the Group Board of Directors and implemented and maintained by senior managers and relevant employees who interact at any level with customers, suppliers and other external parties.

Communication

It is the responsibility of the legal entity or business unit’s Managing Director (or equivalent) to ensure that this policy is regularly communicated to all employees and to all new employees when they join the business.



**Martin Wardhaugh
Group Chief Executive
February 2019**